

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION IX

IN THE MATTER OF:)	U.S. EPA Region IX
)	Docket No. 96-14
TUCSON INTERNATIONAL AIRPORT)	
AREA SUPERFUND SITE,)	
TUCSON, ARIZONA)	
)	UNILATERAL ADMINISTRATIVE
)	ORDER FOR REMOVAL
)	RESPONSE ACTIVITIES
CITY OF TUCSON,)	PURSUANT TO SECTION 106
TUCSON AIRPORT AUTHORITY,)	OF THE COMPREHENSIVE
MC DONNELL DOUGLAS CORPORATION,)	ENVIRONMENTAL RESPONSE
WARNER PROPELLER AND GOVERNOR)	COMPENSATION AND
COMPANY, AND GENERAL DYNAMICS)	LIABILITY ACT OF 1980,
CORPORATION:)	as amended, 42 U.S.C.
)	Section 9606(a)
RESPONDENTS)	

AR0021

I. JURISDICTION AND GENERAL PROVISIONS

This Administrative Order ("Order") is issued to the Respondents, pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. Section 9606(a), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA"), and delegated to the Administrator of the United States Environmental Protection Agency ("EPA") by Executive Order No. 12580, January 23, 1987, 52 Federal Register 2923, and further delegated to the EPA Regional Administrators by U.S. EPA Delegation Nos. 14-14-A and 14-14-B, and further redelegated to the Director, Hazardous Waste Management Division by Region IX Delegations 1290.41 and 1290.42.

EPA has notified the State of Arizona ("State") of the

1 issuance of this Order as required by Section 106(a) of CERCLA,
2 42 U.S.C. Section 9606(a).

3 This Order pertains to specified areas within the Tucson
4 International Airport Area Superfund Site property located in
5 Tucson, Arizona ("TIAA Site") which constitute the removal site
6 ("Removal Site") as further defined herein. This Order requires
7 Respondents to conduct removal activities described herein to
8 abate an imminent and substantial endangerment to the public
9 health and welfare or the environment that may be presented by
10 the actual or threatened release of hazardous substances at or
11 from the Removal Site.

12 II. PARTIES BOUND

13 This Order applies to and is binding upon, Respondents and
14 Respondents' heirs, directors, officers, employees, agents,
15 receivers, trustees, successors and assigns. Any change in
16 ownership or corporate status of Respondents, including, but not
17 limited to, any transfer of assets or real or personal property
18 shall not alter Respondents' responsibilities under this Order.
19 Respondents are jointly and severally liable for carrying out all
20 activities required under this Order. Compliance or
21 noncompliance by one or more Respondents with any provision of
22 this Order shall not excuse or justify noncompliance by any other
23 Respondents. Respondents shall ensure that their contractors,
24 subcontractors, and representatives receive a copy of, and comply
25 with, this Order. Respondents shall be responsible for any
26 noncompliance with this Order.

1 III. FINDINGS OF FACT

2 Based on available information, including the Administrative
3 Record in this matter, EPA hereby finds:

4 1. Site Description/Location

5 The TIAA Site, which was proposed for the National
6 Priorities List ("NPL") on December 30, 1982, pursuant to Section
7 105 of CERCLA, 42 U.S.C. Section 9605, is shown on Attachment 1.
8 The Removal Site which is the subject of this Order consists of
9 an area within the TIAA Site.

10 The proposed action is a time critical removal action as
11 defined in Section 300.415 of the National Contingency Plan
12 ("NCP"), 40 CFR Part 300. The proposed action addresses
13 polychlorinated biphenyl ("PCB") soil contamination located in
14 and around the El Vado Road drainage system, or having the
15 potential to migrate in and around this drainage system.
16 Attachment 2 is a map indicating the general area of the Removal
17 Site, which includes the El Vado Road drainage system.

18 The El Vado Road drainage system originates on Tucson
19 International Airport ("TIA") property. Surface water drainage
20 flows across a drainage ditch which runs parallel to, and
21 approximately 50 feet east of, Highway 89 (also known as Nogales
22 Road), through a culvert which runs beneath Highway 89, and west
23 across several privately owned residential properties. The
24 majority of the Highway 89 drainage ditch is on property owned by
25 Southern Pacific Railroad. The real property located east of
26 Highway 89 currently is zoned and employed for industrial uses

1 (hereinafter parcels located in such area shall be referred to as
2 "Industrial Property"). The real property located west of
3 Highway 89 is zoned and employed for commercial and residential
4 uses (hereinafter parcels located in such area shall be referred
5 to as "Residential Property").

6 2. Respondents

7 From 1948 through the present, Respondent Tucson Airport
8 Authority has operated the TIA, including facilities that
9 contributed PCBs to the Removal Site. Respondent City of Tucson
10 owns the property underlying the TIA, including the portion of
11 the Removal Site located on TIA property, and, prior to October
12 1948, operated portions of the TIAA Site, including facilities
13 that contributed PCBs to the Removal Site. Respondent McDonnell
14 Douglas Corporation (conducting business through its predecessor
15 Douglas Aircraft Co.) and Respondent General Dynamics Corporation
16 (conducting business through its predecessors, Consolidated
17 Vultee Aircraft and Consolidated Aircraft Co.), and Respondent
18 Warner Propeller and Governor Company operated facilities on the
19 TIAA site, including facilities that contributed PCBs to the
20 Removal Site.

21 On August 25, 1992, EPA issued Amended Unilateral
22 Administrative Order No. 92-09 ("EPA Order 92-09") to the
23 Respondents named above (with the exception of Warner Propeller
24 and Governor Company) to, inter alia, conduct a remedial
25 investigation ("RI") to determine the nature and extent of soil
26 and shallow groundwater contamination at, and near, the TIA

1 property. As of the execution date of this Order, Respondents
2 City of Tucson and Tucson Airport Authority ("Participating
3 Respondents"), with the support of two Federal potentially
4 responsible parties, the U.S. Air Force and National Guard
5 Bureau, have complied with EPA Order 92-09. Respondent McDonnell
6 Douglas and Respondent General Dynamics have not participated
7 with other Respondents in complying with EPA Order 92-09. EPA
8 Order 92-09 was not issued to Respondent Warner Propeller and
9 Governor Company.

10 Pursuant to EPA Order 92-09, and subject to EPA and State
11 oversight, Participating Respondents conducted a series of phased
12 investigative field work as part of the RI. The RI field work
13 included soil sampling of suspected PCB contaminated areas.

14 3. Incident/Release Characteristics

15 In November 1995 and pursuant to EPA Order 92-09,
16 Participating Respondents submitted to EPA a deliverable entitled
17 Preliminary Site Characterization Summary ("PSCS") which
18 summarized the environmental sampling data for the TIA property.
19 The PSCS stated that PCB soil contamination as high as 78 parts
20 per million (ppm) had been detected in a small area on TIA
21 property near a building known as Building 25. Although PCBs
22 were detected elsewhere on TIA property, the PCBs detected near
23 Building 25 were of a special concern due to their proximity to
24 the El Vado Road drainage system.

25 Based on the PSCS data, EPA required Participating
26 Respondents to conduct soil sampling of the Residential

1 Properties within the El Vado Drainage west of Highway 89. On
2 February 20, 1996, Participating Respondents collected, and
3 analyzed for PCBs, 24 samples from the vacant lot at the corner
4 of El Vado Road and Highway 89. The data results from the vacant
5 lot samples found PCB concentrations as high as 6.2 ppm. On
6 March 12, 1996, Participating Respondents collected 16 soil
7 samples from three Residential Properties immediately west of the
8 vacant lot on El Vado Road. Participating Respondents sent to
9 EPA a letter dated April 26, 1986 summarizing the results of the
10 March 12, 1996 sampling for PCBs; according to the summary, while
11 one Residential Property produced no samples with PCBs above the
12 State standards described in Paragraph 5 below, samples from the
13 other two Residential Properties were found to have PCB
14 concentrations as high as 2.4 ppm. On May 27, 1996 Respondents
15 took 5 additional soil samples from the two Residential
16 Properties which initially had evidenced contaminated samples and
17 5 soil samples from a currently vacant Residential Property
18 located immediately to the west. Samples from such vacant
19 Residential Property had PCB concentrations as high as 0.43 ppm.
20 Most of the soil samples were taken at a depth of 3 to 12 inches
21 below ground surface.

22 4. Quantities and Types of Substances Present

23 As stated above, based on prior sampling results, EPA
24 estimates that approximately 1,000 to 4,000 cubic yards of soil
25 will require excavation. EPA anticipates that the excavated
26 soils will contain an average PCB concentration, consisting of

1 PCB Aroclor 1254 or Aroclor 1260, of approximately 10 ppm or
2 less. PCBs have been identified at the Removal Site at
3 concentrations ranging from 78 ppm to less than 0.18 ppm.

4 5. Threats to the Public Health, Welfare, and
5 Environment

6 PCBs are hazardous substances as defined in Section 101(14)
7 of CERCLA. In addition, PCBs identified at the Removal Site are
8 in concentrations above health-based standards for soils
9 designated by the State in its regulations entitled "Arizona
10 Department of Environmental Quality Soil Remediation Rules"
11 promulgated December 1995. The State health-based standards for,
12 inter alia, ingestion of soil subject to residential use and
13 industrial use are 0.18 ppm and 0.76 ppm, respectively.

14 On August 19, 1996, at EPA's request, the Arizona Department
15 of Health Services ("ADHS") submitted a draft risk assessment
16 entitled Draft Baseline Human Risk Assessment for the Tucson Area
17 Airport Superfund Site dated July 31, 1996 for incorporation into
18 the RI ("Risk Assessment"). The Risk Assessment identified the
19 following exposure pathways for PCBs within the Removal Site:

- 20 1) Ingestion of contaminated soils;
21 2) Dermal contact with contaminated soils; and,
22 3) Inhalation of fugitive dust from contaminated soils.

23 The Risk Assessment also identified risks of human health
24 effects from actual or potential exposure to PCB's to human
25 populations at and near the Removal Site. PCBs generally have a
26 very low potential for producing acute toxic effects and many

1 people chronically exposed to PCBs show no overt signs or
2 symptoms of toxicity. However, in others, reported signs and
3 symptoms of PCB exposure with hepatic involvement have included
4 weight loss, anorexia, nausea, vomiting, jaundice, and abdominal
5 pain. Chronic exposure may also result in liver injury which may
6 vary in degree depending on the degree of chlorination in the
7 PCBs, dose and duration of exposure, and possible concurrent
8 exposure to hepatotoxins, infectious agents, or certain
9 medications. Headache, dizziness, and edema have been reported.
10 The sole overt sign of PCB exposure is chloracne, a severe skin
11 disorder characterized by prominent lesions on the face, chest,
12 arms and thighs.

13 Natural desert vegetation in and near the Removal Site is
14 sparse. There are no sensitive ecosystems impacted by the PCB
15 contamination at the Removal Site. Surface water from the TIA
16 property drains into the El Vado Road residential properties.

17 IV. CONCLUSIONS OF LAW

18 Based on the foregoing Findings of Fact and the
19 Administrative Record supporting this removal action, EPA has
20 concluded that:

21 1. The Removal Site is a "facility" as defined by Section
22 101(9) of CERCLA, 42 U.S.C. Section 9601(9).

23 2. Each Respondent is a "person" as defined by Section
24 101(21) of CERCLA, 42 U.S.C. Section 9601(21).

25 3. Respondents City of Tucson and Tucson Airport Authority
26 are "owner(s)" and or "operator(s)" of the facility as defined by

1 Section 101(20) of CERCLA, 42 U.S.C. Section 9601(20) and within
2 the meaning of Section 107(a)(1) of CERCLA, 42 U.S.C. Section
3 107(a)(1).

4 4. Respondents Tucson Airport Authority, McDonnell Douglas
5 Corporation, Warner Propeller and Governor Company and General
6 Dynamics Corporation were "owners" and/or "operators" of the
7 facility at the time of disposal of any hazardous substance
8 described in this Section IV at the facility as defined by
9 Section 101(20) of CERCLA, 42 U.S.C. Section 9601(20) and within
10 the meaning of Section 107(a)(2) of CERCLA, 42 U.S.C. Section
11 107(a)(2)

12 5. Respondents McDonnell Douglas Corporation, Warner
13 Propeller and Governor Company and General Dynamics Corporation
14 arranged for disposal or treatment, or arranged for transport for
15 disposal or treatment by any other party of any hazardous
16 substance described in this Section IV at the facility within the
17 meaning of Section 107(a)(3) of CERCLA, 42 U.S.C. Section
18 9607(a)(3).

19 6. Polychlorinated biphenyls ("PCBs") found at the Removal
20 Site, as identified in the Findings of Fact above, are "hazardous
21 substances" as defined by Section 101(14) of CERCLA, 42 U.S.C.
22 Section 9601(14), and Section 302.4 of the National Contingency
23 Plan ("NCP"), 40 CFR Part 300.

24 7. The conditions described in the Findings of Fact above
25 constitute an actual or threatened "release" of a hazardous
26 substance from the facility as defined by Sections 101(22) of

1 CERCLA, 42 U.S.C. Section 9601(22).

2 8. For the reasons identified above, each Respondent is
3 liable under Section 107(a) of CERCLA, 42 U.S.C. Section 9607.

4 V. DETERMINATIONS

5 Based upon the above Findings of Fact, and the
6 Administrative Record supporting this Removal Action, EPA has
7 made the following determinations:

8 1. The conditions present at the Removal Site constitute an
9 imminent and substantial endangerment to the public health,
10 welfare, or the environment based upon consideration of the
11 factors set forth in the ("NCP") at 40 CFR Section 300.415(b).

12 2. The actual or threatened release of hazardous substances
13 from the Removal Site may present an imminent and substantial
14 endangerment to the public health, welfare, or the environment
15 within the meaning of Section 106(a) of CERCLA, 42 U.S.C. Section
16 9606(a).

17 3. The removal actions required by this Order are necessary
18 to protect the public health, welfare, or the environment and are
19 not inconsistent with the NCP and CERCLA.

20 VI. ORDER

21 Based upon the foregoing Findings of Fact, Conclusions of
22 Law, Determinations, and Administrative Record for this Removal
23 Site, and pursuant to Section 106(a) of CERCLA, 42 U.S.C. Section
24 9606(a), EPA hereby orders Respondents to comply with the
25 following provisions, including, but not limited to, all
26 attachments to this Order, all documents incorporated by

1 reference to this Order, and all schedules and deadlines in this
2 Order, attached to this Order or incorporated by reference into
3 this Order, and perform the following actions under EPA's
4 direction.

5 1. Notice of Intent to Comply

6 Each Respondent shall notify EPA in writing within fifteen
7 (15) business days after the effective date of this Order of each
8 such Respondent's irrevocable intent to comply with this Order.
9 Failure of any Respondent to provide such notice shall be a
10 violations of this Order by such Respondent. Hereinafter, a
11 "business day" shall mean every day of the week except Saturdays,
12 Sundays and federal holidays. Hereinafter, a "calendar day"
13 shall mean every day of the week including Saturdays, Sundays and
14 federal holidays.

15 2. Work Plan Submission and Approval.

16 Within twenty (20) business days after the effective date of
17 this Order, Respondents shall submit to EPA for approval, a Draft
18 Work Plan for the removal action set forth in Paragraph 5 below.
19 The Draft Work Plan shall provide a description of, and an
20 expeditious schedule for, the action required by this Order. EPA
21 shall review the Draft Work Plan and may in writing declare the
22 Draft Work Plan "approved", "approved with comment", "approved
23 with modifications", or "disapproved with comment". If EPA's
24 letter determines the Draft Work Plan to be approved with comment
25 or disapproved with comment, the Respondents shall have ten (10)
26 business days to submit a revised, Final Work Plan that fully

1 incorporates all information and comments supplied by EPA. EPA,
2 in its discretion, may extend this 10 business day cure period.
3 If EPA determines the Final Work Plan to be disapproved with
4 comment, EPA may take any actions permitted under Section XIII of
5 this Order. Respondents shall implement the Work Plan as finally
6 approved or approved with modifications by EPA. The date of such
7 an approval letter or approved with modifications letter shall be
8 the date for calculating certain subsequent deadlines required by
9 the Order. Once approved, or approved with modifications, the
10 Work Plan shall be deemed to be incorporated into, and made a
11 fully enforceable part of, this Order. Respondents shall notify
12 EPA at least 48 hours prior to performing any on-site work
13 pursuant to the EPA approved Work Plan. Respondents shall not
14 commence or undertake any removal actions at the Removal Site
15 without prior EPA approval.

16 3. Health and Safety Plan

17 The Work Plan shall include a plan that ensures the
18 protection of public health and safety during performance of on-
19 site work under this Order. The health and safety plan shall be
20 prepared in accordance with EPA's Standard Operating Safety Guide
21 (dated November, 1984 and updated July, 1988) and shall comply
22 with all current applicable Occupational Safety and Health
23 Administration ("OSHA") regulations applicable to Hazardous Waste
24 Operations and Emergency Response, 29 CFR Part 1910. Respondents
25 shall incorporate all changes to the health and safety plan
26 recommended by EPA and implement the health and safety plan

1 during the removal action.

2 4. Designation of Contractor

3 Respondents shall perform the removal action or shall retain
4 one or more environmental contractors to perform the removal
5 action required under this Order. Respondents' shall notify EPA
6 of Respondents' qualifications or the name(s) and qualifications
7 of Respondents' contractor(s) within fifteen (15) business days
8 of the effective date of this Order. Respondents' shall also
9 notify EPA of the name(s) and qualifications of any other
10 contractor(s) or subcontractor(s) retained to perform the removal
11 action under this Order at least ten (10) business days prior to
12 commencement of such removal action.

13 EPA retains the right to disapprove of any, or all, of the
14 contractors and/or subcontractors retained by Respondents or of
15 Respondents choice of themselves to do the removal action. If
16 EPA disapproves of a selected contractor or Respondents,
17 Respondents shall retain a different contractor to perform the
18 work within ten (10) business days following the Respondents'
19 receipt of EPA's written disapproval and shall notify EPA of that
20 contractor's name or Respondent's name and qualifications within
21 ten (10) business days of EPA's disapproval.

22 5. Implementation of the Work Plan

23 Within ten (10) business days after EPA approves or approves
24 with modification the Work Plan, Respondents shall begin
25 implementing such Work Plan. Failure of any Respondent to
26 properly implement any aspect of the Work Plan shall be a

1 violation of this Order. At a minimum, under the Work Plan,
2 Respondents shall perform, and complete within sixty (60)
3 business days after the above-mentioned EPA approval of the Work
4 Plan, the removal actions identified in subparagraphs (a-j)
5 below:

- 6 a. Obtain written legal access for purposes of
7 implementing the terms of this Order including the Work
8 Plan to all properties not owned or controlled by the
9 Respondents as provided in Section VI, Paragraph 12
10 below.
- 11 b. Provide security during removal operations.
- 12 c. Perform air monitoring and sampling in accordance with
13 OSHA requirements during all phases of the removal
14 action, especially when there is a potential for
15 airborne releases of toxic air contaminants.
16 Operational controls such as dust suppression will be
17 used to abate fugitive dust emissions.
- 18 d. Remove or stockpile non-hazardous vehicles, equipment,
19 plants, structures and debris to provide adequate space
20 for response operations. With respect to any occupied
21 Residential Properties, the Work Plan shall require:
 - 22 (i) Best efforts to accommodate the residential
23 property owner regarding plant removal and acceptable
24 replacement of any removed plants;
 - 25 (ii) Best efforts to avoid removing or disturbing any
26 mature trees; and,

- (iii) Best efforts to accommodate the residential property owner regarding removal (or any associated disturbances) and replacement of structures or material on property owned by residential property owner.
- e. Remove contaminated equipment, structures and debris for proper disposal in compliance with state and federal regulations. Decontaminate structures pursuant to applicable state and federal regulations and laws.
- f. If needed, conduct additional surface and subsurface soil sampling to determine the nature and extent of PCB contamination.
- g. Excavate, load, and containerize into a ("roll-off") bin or drum (and cover each bin or drum) all Removal Site soils with estimated PCB contamination in excess of 0.18 ppm for any Residential Property and 0.76 ppm for any Industrial Property. With respect to any occupied Residential Properties, the Work Plan shall require:
- (i) Best efforts to accommodate the property owner regarding the location and temporary storage duration of any bin or drum, and;
- (ii) Best efforts to accommodate the property owner regarding the acceptable days and times of excavation activities.
- h. Using predefined grid spacing with appropriate data quality objectives, conduct verification soil sampling

1 of the floor and sidewalls of each excavated area to
2 determine the nature and extent of any remaining PCB
3 contamination. The Work Plan shall also provide that:
4 (i) Respondents shall provide EPA and ADEQ oral notice
5 48 hours in advance of any verification sampling;
6 (ii) Respondents shall request verification samples in
7 not greater than a 72-hour data turnaround time for the
8 analytic laboratory to provide data results; and
9 (iii) Respondents shall repeat the work in
10 subparagraphs 5(g) and 5(h) in any excavation area
11 where any PCB soil cleanup level is exceeded.

12 i. Prepare all excavated PCB soils for transportation and
13 disposal as follows:

14 (i) Submit a "Transportation and Disposal Plan" to EPA
15 which:

16 - provides a brief description of applicable
17 transportation regulations, a proposed route of
18 shipment and proposed schedule for off-site shipment of
19 each bin or drum referenced in subparagraph g;

20 - provides the estimated volume, weight, and average
21 PCB concentration of PCB soils contained in each bin or
22 drum referenced in subparagraph g; -

23 - proposes the final destination (name and address of
24 each off-site disposal facility) of each bin or drum
25 referenced in subparagraph (g).

26 Upon EPA approval of the Transportation and Disposal

1 Plan, manifest each bin or drum of PCB soils for direct
2 shipment to the off-site disposal facility(s) in a
3 manner compliant with federal, state, and local laws and
4 as provided by Section VI, Paragraph 9 below;

5 (ii) Upon EPA disapproval of the Transportation and
6 Disposal Plan, transfer to and store on TIA property
7 each bin and drum of PCB soils in a manner that is
8 protective of human health and the environment,
9 receives EPA and ADEQ pre-approval, and is compliant
10 with federal, state, and local laws. Final disposition
11 of any such stored PCB soils shall be in accordance
12 with Subparagraph i or in accordance with the EPA Soils
13 of Record of Decision for the TIA property.

- 14 j. Refill, compact, and regrade to the original grade all
15 excavated areas with clean, imported fill soils.
16 Imported fill soils shall not exceed State health based
17 soil standards or TIAA Site background levels. Fill
18 soils shall include an appropriate amount of "top
19 soil". With respect to occupied Residential
20 Properties, the Work Plan shall provide for best
21 efforts to accommodate the property owner regarding the
22 source of all imported soils.

23 6. Relocation.

24 Respondents shall offer each Residential Property owner and
25 all current residents residing in homes or other dwellings

1 located within the Removal Site the opportunity to enter into a
2 voluntary relocation agreement which, at a minimum, includes
3 provisions for:

4 a. comparable lodging outside the Removal Site for each
5 such owner and/or current resident paid by Respondents
6 for each day during which soil excavation activities
7 occur on property where such owner or current resident
8 resides or on any property adjacent thereto;

9 b. a per diem paid by Respondents for each owner or
10 current resident who enters into a voluntary relocation
11 agreement which is adequate to cover additional living
12 expenses incurred as the result of relocating;

13 Such agreement offer shall be in writing and shall specify
14 terms and conditions including lodging location, the process
15 for payment of per diems, costs not covered by the
16 relocation agreement, and the duration of the relocation
17 agreement.

18 7. Reporting

19 Commencing on the first week following the approval of the
20 Work Plan and continuing until the termination of this Order,
21 unless otherwise directed in writing by the OSC, Respondents
22 shall provide to EPA written weekly progress reports. These
23 progress reports shall summarize significant developments during
24 the preceding period, including actions performed and any
25 problems encountered, analytical data received during the
26 reporting period, and the developments anticipated during the

1 next reporting period, including a schedule of work to be
2 performed, anticipated problems and planned resolutions of past
3 or anticipated problems.

4 8. Quality Assurance and Sampling

5 All sampling and analyses performed pursuant to this Order
6 shall conform to EPA direction, approval and guidance regarding
7 sampling, quality assurance/quality control data ("QA/QC"), data
8 validation, and chain of custody procedures. Respondents shall
9 ensure that the laboratory used to perform the analyses
10 participates in a QA/QC program that complies with the
11 appropriate EPA guidance. Respondents shall follow as guidance
12 for QA/QC and sampling: "Quality Assurance/Quality Control
13 Guidance for Removal Activities": "Sampling QA/QC Plan and Data
14 Validation Procedures," EPA OSWER Directive 9360.4-01, dated
15 April, 1990; and "Environmental Response Team Standard Operating
16 Procedures," OSWER Directive Number 9360.4-01.

17 Upon request by EPA, Respondents shall have such a
18 laboratory analyze samples submitted by EPA for quality-assurance
19 monitoring. Respondents shall provide to EPA the quality
20 assurance/quality control procedures followed by all sampling
21 teams and laboratories performing actions under this Order.

22 Respondents shall notify EPA not less than two (2) business
23 days in advance of any sample collection activity. Upon request
24 by EPA, Respondents shall allow EPA or its authorized
25 representatives to take split and/or duplicate samples of any
26 samples collected by Respondents. EPA shall have the right to

1 take any additional samples that it deems necessary.

2 9. Off-Site Treatment, Storage or Disposal.

3 Any hazardous substance, pollutant, or contaminant removed
4 off-Site pursuant to this Order for treatment, storage or
5 disposal shall be treated stored or disposed of at a facility in
6 compliance with, as determined by EPA, Section 121(d)(3) of
7 CERCLA, 42 U.S.C. §9621(d)(3), and the EPA "Revised Procedures
8 for Implementing Off-Site Response Actions, " (OSWER Directive
9 9834.11, November 13, 1987).

10 10. Project Coordinator; Designation of OSC; Submissions

11 Within fifteen (15) business days after the effective date
12 of this Order, Respondents shall designate a Project Coordinator
13 who shall be responsible for administration of all of the actions
14 required under this Order subject to the direction of the On-
15 Scene Coordinator ("OSC"). To the greatest extent possible, the
16 Project Coordinator shall be present on-site or readily available
17 during site work. Respondents shall submit the designated
18 Project Coordinator's name, address, telephone number and
19 qualifications to EPA. EPA retains the right to disapprove of
20 any Project Coordinator named by the Respondents. If EPA
21 disapproves of a selected Project Coordinator, Respondents shall
22 retain a different Project Coordinator and shall notify EPA of
23 that person's name and qualifications within 5 business days
24 following EPA 's disapproval. Receipt by Respondents' Project
25 Coordinator of any notice or communication from EPA relating to
26 this Order shall constitute receipt by all Respondents.

1 EPA has designated Craig Cooper of the EPA Region IX, Site
2 Cleanup Branch, as its On-Scene Coordinator ("OSC"). The Project
3 Coordinator shall direct all submissions, including documents,
4 reports and correspondence, required by this Order to the OSC,
5 and shall copy the below listed parties:

6 Craig Cooper
7 EPA Region IX
8 75 Hawthorne Street, H-7-2
9 San Francisco, California 94105

10 Richard Olm
11 Arizona Department of Environmental Quality
12 3033 Central Avenue
13 Phoenix, AZ 85012

14 Craig Kafura
15 Arizona Department of Environmental Quality
16 400 W. Congress; Suite 433
17 Tucson, AZ 85701

18 Gayle Willer
19 TCE Superfund Information Library
20 c/o El Pueblo Neighborhood Center, Bldg B-2
21 101 W. Irvington
22 Tucson, AZ 85714

23 11. Change of Project Manager or OSC

24 EPA and Respondents each shall have the right to change
25 their respective designated OSC or Project Coordinator. EPA
26 shall notify Respondents, and Respondents shall notify EPA, as
27 early as possible before such change is made, but in no case less
28 than 24 hours before such change. Notification may initially be
29 made orally, but shall be promptly followed by written notice.

30 12. Access to Property and Information

31 Respondents shall provide and/or obtain access to the
32 Removal Site and off-site areas to which access is necessary to

1 implement this Order, and provide access to all records and
2 documentation related to the conditions at the Removal Site and
3 the Action conducted pursuant to this Order. Such access shall
4 be provided to EPA employees, contractors, agents, consultants,
5 designees, representatives and ADEQ representatives. These
6 individuals shall be permitted to move freely at the Removal Site
7 and appropriate off-site areas in order to conduct actions which
8 EPA determines to be necessary. Respondents shall submit to EPA
9 upon receipt, the results of all sampling or tests and all other
10 data generated by Respondents or their contractors or on the
11 Respondent behalf during implementation of this Order.

12 Where action under this Order is to be performed in areas
13 owned by, or in possession of, someone other than Respondents,
14 Respondents shall use their best efforts to obtain all necessary
15 access agreements within twenty (20) business days after the
16 effective date of this Order, or as otherwise specified in
17 writing by the OSC. Respondents shall immediately notify EPA in
18 writing if after using their best efforts Respondents are unable
19 to obtain such agreements. Such notification to EPA shall
20 document all of Respondents' efforts, including copies of all
21 correspondence, draft agreements, offers, and communications.
22 EPA may then assist Respondents in gaining access, to the extent
23 necessary to effectuate the removal actions described herein,
24 using such means as EPA deems appropriate. EPA reserves the
25 right to seek reimbursement from Respondents for all costs and
26 attorneys' fees incurred by the United States in obtaining access

1 for Respondents.

2 13. Record Retention

3 Respondents shall preserve originals or copies of all
4 documents, records and information relating to work performed
5 under this Order, or relating to hazardous substances found on or
6 released from the Removal Site, for ten (10) years following
7 completion of the removal actions required by this Order. At the
8 end of this ten (10) year period and thirty (30) days before any
9 document or information is destroyed, Respondents shall notify
10 EPA that such documents and information are available to EPA for
11 inspection, and upon request, shall provide the originals or
12 copies of such documents and information to EPA. In addition,
13 Respondents shall provide documents and information retained
14 under this Section at any time before expiration of the ten (10)
15 year period at the written request of EPA.

16 14. Final Report

17 Within forty (40) business days after completion of all
18 removal actions required by Section VI, Paragraph 5 of this
19 Order, Respondents shall submit to EPA for review and approval a
20 final report summarizing the actions taken to comply with this
21 Order. The final report shall conform, at a minimum, with the
22 requirements set forth in Section 300.165 of the NCP entitled
23 "OSC" Reports, including, but not limited to:

- 24 a. identification and history of the Removal Site;
25 b. a description of the locations and types of hazardous

1 substances encountered at the facility upon the
2 initiation of work performed under this Order;

3 c. a chronology and description of the actions performed;

4 d. a discussion of how all problems were resolved;

5 e. a listing of quantities and types of materials removed
6 from the Removal Site;

7 f. a discussion of removal and disposal options considered
8 for any such materials; and

9 g. a listing of the ultimate destination of those
10 materials, and a presentation of the analytical results
11 of all sampling and analysis performed and accompanying
12 appendices containing all relevant paperwork prepared
13 during the action, including, but not limited to,
14 manifests, invoices, bills, contracts, permits.

15 The final report shall include a good faith estimate of total
16 costs or a statement of actual costs incurred in complying with
17 the Order, a listing of quantities and types of material removed,
18 a discussion of removal and disposal options considered for those
19 materials, a listing of the ultimate destinations of those
20 materials, a presentation of the analytical results of all
21 sampling and analyses performed, and accompanying appendices
22 containing all relevant documentation generated during the
23 removal action including, but not limited to, manifests,
24 invoices, bills, contracts and permits. The final report shall be
25 sealed by a geologist or engineer registered in the State of
26 Arizona and also include the following signed by the person who

1 supervised or directed the preparation of the final report:

2 Under penalty of law, I certify that to the best of my
3 knowledge, after appropriate inquiries of all relevant
4 persons involved in the preparation of this final report,
5 the information submitted is true, accurate, and complete. I
6 am aware that there are significant penalties for submitting
7 false information, including the possibility of fine and
8 imprisonment for knowing violations.

9 15. Compliance with Other Laws

10 Respondents shall perform all actions required pursuant to
11 this Order in compliance with all applicable federal, state, and
12 local laws and regulations, except as provided in CERCLA section
13 121(e) and 40 C.F.R. Section 300.415(i). In accordance with 40
14 C.F.R. Section 300.415(i) and "The Superfund Removal Procedures
15 for Consideration of ARARs During Removal Actions," OSWER
16 Directive No. 9360.3-02, August 1991, all on-site actions
17 required pursuant to this Order shall, to the extent practicable,
18 as determined by EPA, considering the exigencies of the
19 situation, attain applicable or relevant and appropriate
20 requirements ("ARAR's") under federal environmental, state
21 environmental or facility siting laws.

22 16. Emergency Response and Notification of Releases

23 If any incident, or change in Removal Site conditions,
24 during the actions conducted pursuant to this Order causes or
25 threatens to cause an additional release of hazardous substances
26 from the Removal Site or an endangerment to the public health,

1 welfare, or the environment, Respondents shall immediately take
2 all appropriate action. Respondents shall take these actions in
3 accordance with all applicable provisions of this Order,
4 including, but not limited to the Health and Safety Plan, in
5 order to prevent, abate or minimize such release or endangerment
6 caused or threatened by the release. Respondents shall also
7 immediately notify the OSC or, in the event of his or her
8 unavailability, shall notify the Regional Duty Officer, EPA
9 Region IX, Emergency Planning and Response Section (415) 744-2000
10 of the incident or site conditions. If Respondents fail to take
11 action, then EPA may respond to the release or endangerment and
12 reserve the right to pursue cost recovery.

13 In addition, in the event of any release of a hazardous
14 substance, Respondents shall immediately notify EPA's OSC (415)
15 744-2000 and the National Response Center at (800) 424-8802.
16 Respondent shall submit a written report to EPA within 7 days
17 after each release, setting forth the events that occurred and
18 the measures taken or to be taken to mitigate any release or
19 endangerment caused or threatened by the release and to prevent
20 the reoccurrence of such a release. This reporting requirement
21 is in addition to, not in lieu of, reporting under CERCLA Section
22 103(c) and Section 304 of the Emergency Planning and Community
23 Right-To-Know Act of 1986, 42 U.S.C. Sections 11001 et seq.

24 VII. AUTHORITY OF EPA ON-SCENE COORDINATOR

25 The OSC shall be responsible for overseeing the proper and
26 complete implementation of this Order. The OSC shall have the

1 authority vested in an OSC by the NCP, 40 CFR 300.120, including
2 the authority to halt, conduct, or direct any action required by
3 this Order, or to direct any other removal action undertaken by
4 EPA or Respondents at the Removal Site. Absence of the OSC from
5 the Removal Site shall not be cause for stoppage of work unless
6 specifically directed by the OSC.

7 VIII. RESERVATION OF RIGHTS

8 Except as specifically provided in this Order nothing herein
9 shall limit the power and authority of EPA or the United States
10 to take, direct, or order all actions necessary to protect public
11 health, welfare or the environment or to prevent, abate or
12 minimize an actual or threatened release of hazardous substances,
13 pollutants or contaminants, or hazardous or solid waste on, at,
14 or from the Removal Site. Further, nothing contained herein
15 shall prevent EPA from seeking legal or equitable relief to
16 enforce the terms of this Order, or from taking other legal or
17 equitable action as it deems appropriate and necessary, or from
18 requiring Respondents in the future to perform additional
19 activities pursuant to CERCLA, 42 U.S.C. Section 9601, et seq.,
20 or other applicable law. EPA reserves the right to bring an
21 action against Respondents under Section 107 of CERCLA, 42 U.S.C.
22 Section 9607, for recovery of any response costs incurred by the
23 United States related to this Order or the Removal Site and not
24 reimbursed by Respondents.

25 IX. REIMBURSEMENT OF COSTS

26 Respondents shall reimburse EPA, upon written demand, for

1 all response costs incurred by the United States in overseeing
2 Respondents' implementation of the requirements of this Order.
3 EPA may submit to Respondents on a periodic basis a bill for all
4 response costs incurred by the United States with respect to this
5 Order. EPA's itemized Cost Summary, or such other summary as
6 certified by EPA, shall serve as the basis for payment.

7 Respondents shall, within thirty (30) days of receipt of the
8 United States' bill for response costs, remit a cashier's or
9 certified check for the amount of those costs made payable to the
10 "Hazardous Substance Superfund" to the following address:

11 U.S. Environmental Protection Agency
12 Superfund Accounting
13 P.O. Box 360863M
14 Pittsburgh, PA 15251

15 Respondents shall simultaneously transmit a copy of the
16 check to the OSC at the address listed in Section VI, Paragraph
17 10 above. Payments shall be designated as "Response Costs -
18 Tucson International Airport Area Superfund Site; SSID Name:
19 Tucson PCB, SSID Number: "CW" and shall reference the payors'
20 name and address, the EPA site identification number AZD980737530
21 and the docket number of this Order.

22 Interest at a rate established under Section 107(a) of
23 CERCLA shall begin to accrue on the unpaid balance from the
24 thirty (30) days after the date of the original demand
25 notwithstanding any dispute or an objection to any portion of the
26 costs.

27 X. MODIFICATIONS

1 Modifications to any plan or schedule may be made in writing
2 by the OSC or at the OSC's oral direction. If the OSC makes an
3 oral modification, it will be memorialized in writing within five
4 (5) business days; provided, however, that the effective date of
5 the modification shall be the date of the OSC's oral direction.
6 The remainder of the Order, or any other portion of the Order may
7 only be modified in writing by signature of the Division
8 Director, Superfund Division. If Respondents seek permission to
9 deviate from any approved plan or schedule, Respondents' Project
10 Coordinator shall submit a written request to EPA for approval
11 outlining the proposed modification and its basis.

12 All modification requests submitted pursuant to this Section
13 X shall be sent by certified mail, return receipt requested, and
14 addressed to the following:

15 one copy to: Craig Cooper
16 On-Scene Coordinator (H-7-2)
17 U.S. EPA, Region 9
18 75 Hawthorne Street
19 San Francisco, CA 94105
20 (415) 744-2370

21 one copy to: Danita Yocom
22 Office of Regional Counsel (RC-3-2)
23 U.S. EPA, Region 9
24 75 Hawthorne Street
25 San Francisco, CA 94105
26 (415) 744-1347

27 No informal advice, guidance, suggestion, or comment by EPA
28 regarding reports, plans, specifications, schedules, or any other
29 writing submitted by Respondents shall relieve Respondents of
30 their obligation to obtain such formal approval as may be
31 required by this Order, and to comply with all requirements of

1 this Order unless it is formally modified.

2 XI. ACCESS TO ADMINISTRATIVE RECORD

3 The Administrative Record supporting the actions taken
4 pursuant to this Order is available for review during business
5 hours in the Superfund Record Center, U. S. Environmental
6 Protection Agency, Region IX, 95 Hawthorne Street, San Francisco,
7 California 94105 [415-536-2000], and at the TCE Superfund
8 Information Library, 101 W. Irvington, Building B-2, Tucson,
9 Arizona 85714 [520-889-9194]. If additional information becomes
10 available, EPA will revise the Administrative Record to reflect
11 such material. A draft Index to the Administrative Record is
12 attached to this the Order as Attachment 3.

13 XII. OPPORTUNITY TO CONFER

14 Within three (3) business days after the effective date
15 of this Order, Respondents may request a conference with EPA at
16 its Region IX offices located at 75 Hawthorne Street, San
17 Francisco, California. Any such conference shall be held within
18 ten (10) business days following the effective date of this Order
19 unless extended by agreement of the parties. At any conference
20 held pursuant to such request, Respondents may appear in person
21 or be represented by an attorney or other representative. If a
22 conference is held, Respondents may present any information,
23 arguments or comments regarding this Order. Regardless of
24 whether a conference is held, Respondents may submit any
25 information, arguments or comments in writing to EPA within two
26 (2) business days following the conference, or within seven (7)

1 business days of issuance of the Order if no conference is
2 requested. Any such conference is not an evidentiary hearing,
3 does not constitute a proceeding to challenge this Order and does
4 not give Respondents a right to seek review of this Order.
5 Requests for a conference, or any written submittal under this
6 paragraph, shall be directed to Danita Yocom, Assistant Regional
7 Counsel at (415) 744-1347, EPA Region IX, 75 Hawthorne Street San
8 Francisco, California.

9 XIII. PENALTIES FOR NONCOMPLIANCE

10 Violation of any provision of this Order may subject any
11 such Respondent to civil penalties of up to twenty-five thousand
12 dollars (\$25,000) per violation per day, as provided in section
13 106(b)(1) of CERCLA, 42 U.S.C. Section 9606(b). Respondents may
14 also be subject to punitive damages in an amount up to three
15 times the amount of any cost incurred by the United States as a
16 result of any such violation, as provided in section 107(c)(3) of
17 CERCLA, 42 U.S.C. Section 9607(c)(3). Should any Respondent
18 violate this Order or any portion hereof, EPA unilaterally may
19 carry out the actions required by this Order, pursuant to section
20 104 of CERCLA, 42 U.S.C. Section 9604, and/or may seek judicial
21 enforcement of this Order pursuant to Section 106 of CERCLA, 42
22 U.S.C. Section 9606.

23 XIV. OTHER CLAIMS

24 By issuing this Order, the United States, including EPA,
25 assumes no liability for injuries or damages to persons or
26 property resulting from any actions or omissions of Respondents.

1 The United States, including EPA, shall not be deemed to be a
2 party to any contract entered into by Respondents or their
3 directors, officers, employees, agents, successors,
4 representatives, assigns, contractors or consultants in carrying
5 out actions pursuant to this Order. This Order does not
6 constitute a pre-authorization of funds under Section 111(a)(2)
7 of CERCLA, 42 U.S.C. Section 9611(a)(2). Nothing in this Order
8 shall constitute a satisfaction of or release from any claim or
9 cause of action against the Respondents or any person not a party
10 to this Order, for any liability such person may have under
11 CERCLA, other statutes, or the common law, including, but not
12 limited to, any claims of the United States for costs, damages
13 and interest under section 106(a) and 107(a) of CERCLA, 42 U.S.C.
14 Section 9606(a) and 9607(a).

15 XV. NOTICE OF COMPLETION

16 When EPA determines, after EPA's review of the Final Report,
17 that all removal actions have been fully performed in accordance
18 with this Order, with the exception of any continuing obligations
19 required by this Order, including work required pursuant to the
20 Consent Decree 90-587 TUC-RMB entered by the court on June 5,
21 1991 and EPA Order 92-09, EPA will provide notice to Respondents.
22 If EPA determines that any removal actions have not been
23 completed in accordance with this Order, EPA will notify
24 Respondents, provide a list of the deficiencies and require that
25 Respondents modify the Work Plan to correct such deficiencies.
26 Respondents shall implement the modified and approved Work Plan

1 and shall submit a modified Final Report in accordance with the
2 EPA notice. Failure by Respondents to implement the approved
3 modified Work Plan shall be a violation of this Order.

4 XVI. SEVERABILITY

5 If a court issues an order that invalidates any provision of
6 this Order or finds that Respondents have sufficient cause not to
7 comply with one or more provisions of this Order, Respondents
8 shall remain bound to comply with all provisions of this Order
9 not invalidated or determined to be subject to a sufficient cause
10 defense by the court's order.

11 XVII. EFFECTIVE DATE

12 This Order shall be effective five (5) business days after
13 the Order is signed by the Director, Superfund Division, EPA
14 Region IX, unless modified in writing by EPA.

15
16 THIS ORDER IS ISSUED on this 4th day of October, 1996.

17 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

18 By: Keith Takata
19 Keith Takata, Director
20 Superfund Division
21 U. S. Environmental Protection Agency
22 Region IX

1 Region IX Contacts:

2 Craig Cooper

3 On Scene Coordinator

4 Arizona and California Cleanup Section (H-7-2)

5 Superfund Division

6 U.S. EPA, Region IX

7 75 Hawthorne Street

8 San Francisco, CA 94105

9 (415) 744-2370

10 Danita Yocom

11 Assistant Regional Counsel (RC-3-2)

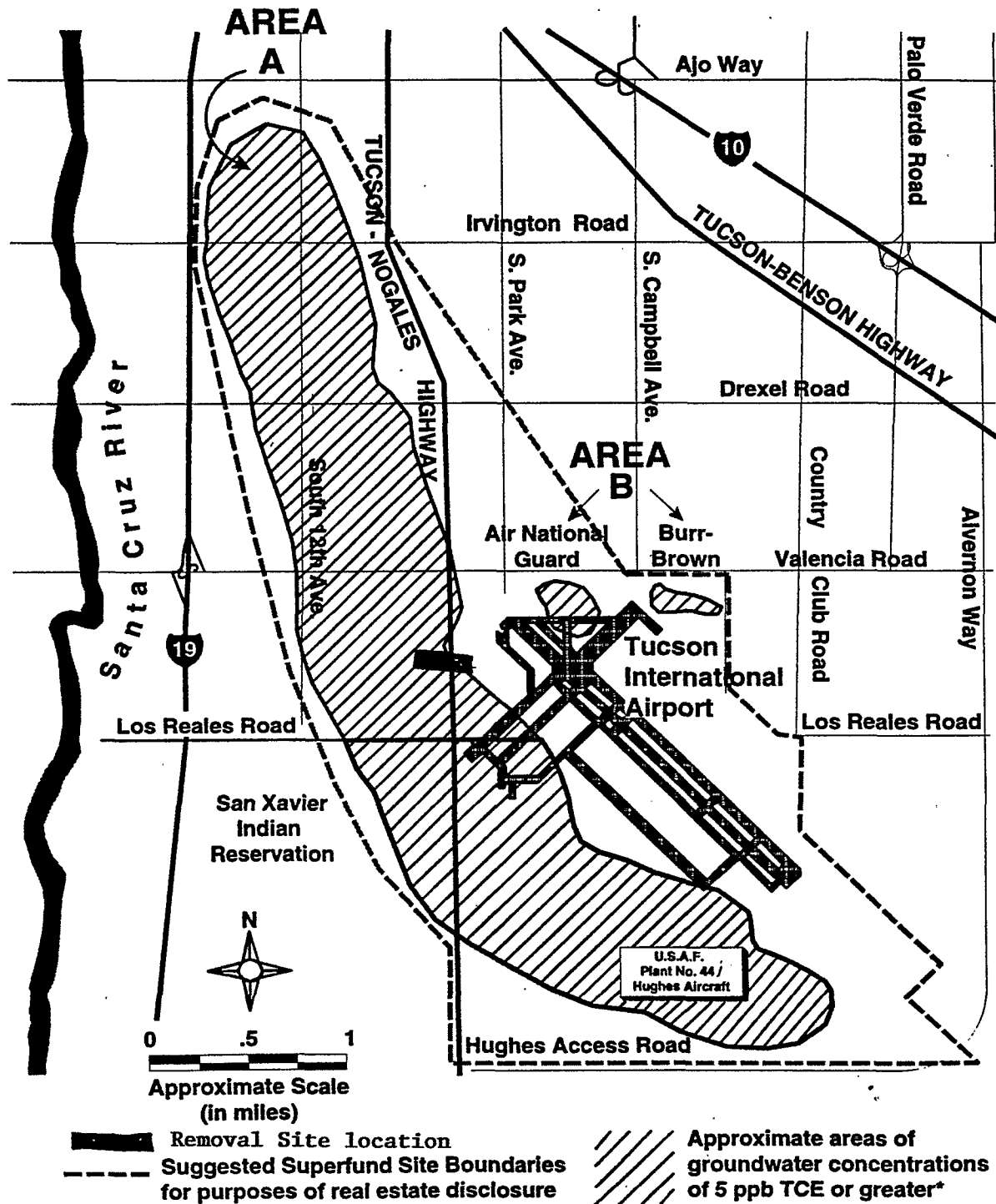
12 Office of Regional Counsel

13 U.S. EPA, Region IX

14 75 Hawthorne Street

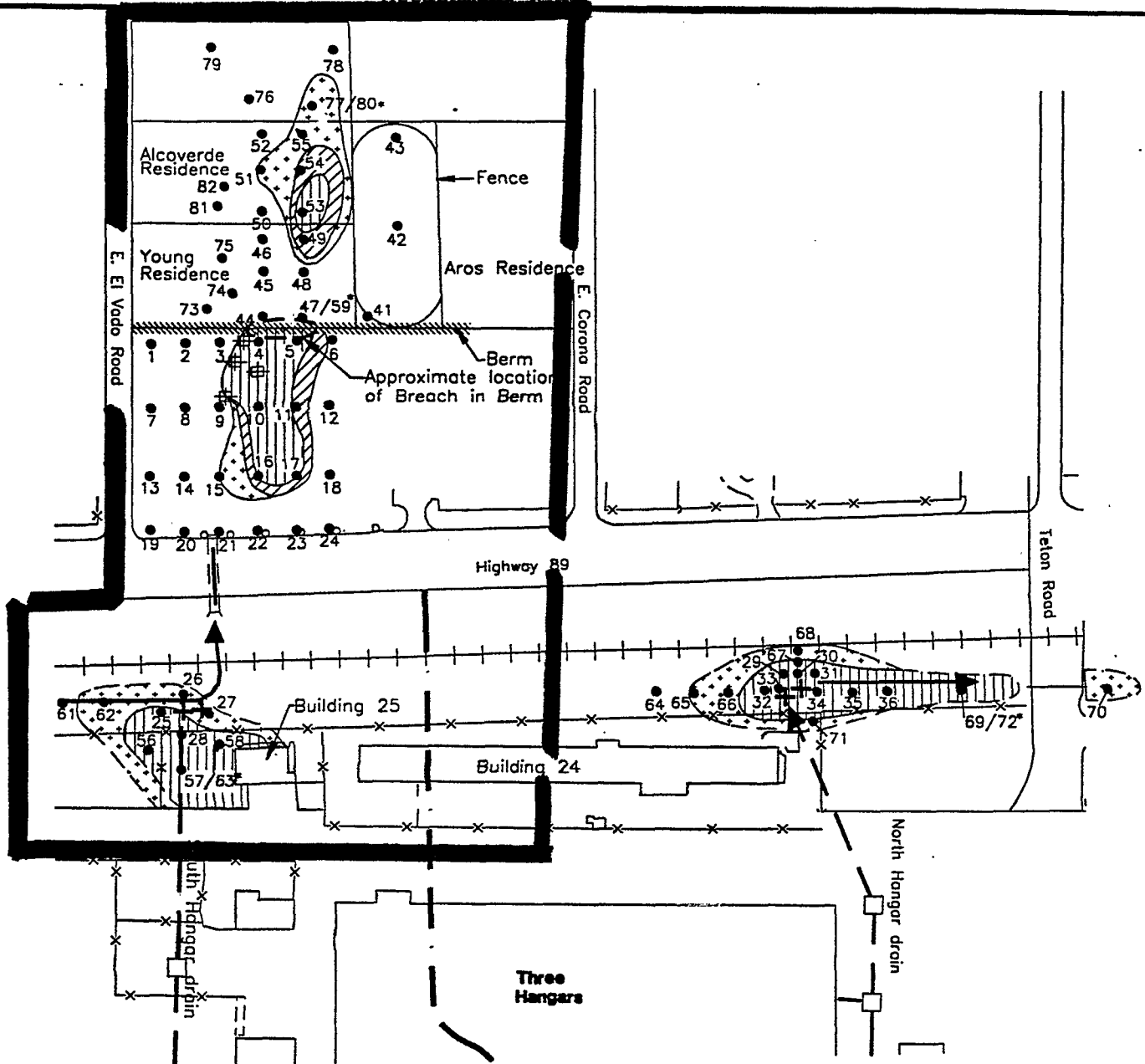
15 San Francisco, CA 94105

16 (415) 744-1347



*Indicates identified area of contamination prior to the start of cleanup; ongoing cleanup programs have markedly reduced the area of contamination.

Figure I: Map displaying the Tucson International Airport Area Superfund site



- Notes:**
1. All sample identifications begin with the prefix "E421-S"
 2. * = Duplicate sample I.D.

Removal Site Boundaries



0 175 ft

Explanation

	ECO -Risk sample location		(0.18-1.0 mg/kg)
	ATSDR sample location		(1.0-1.5 mg/kg)
	Shallow soil sample location and identification		(> 1.5 mg/kg)



DANIEL B. STEPHENS & ASSOCIATES, INC.
4-19-96 JN 6005

PCB Soil Sampling Results

Figure 1

Page 1
09/25/96

Tucson Intl Airport Area

Tucson, Arizona

*** Draft Administrative Record Index ***

DOC #	AR #	DATE yy/mm/dd	AUTHOR	ADDRESSEE	SUBJECT	FOIA	CBI	DISC	TYPES/ACTIVITIES DESCRIPTORS	CONTRACT INFO
0229-00923	00-0001	95/11/17	Daniel B Stephens & Assoc, Inc	Environmental Protection Agency - Region 9	Preliminary site characterization summary, volume 1: Report text, Section 4.30 only - ATSDR & ecological risk assessment sampling				56,83,41,84,22,04,28	
0229-00922	00-0002	96/03/14	AZ Dept of Environmental Quality		Addendum to concise explanatory statement for emergency soil remediation rules w/attchs & TL of 4/5/96 fr Arizona Dept of Environmental Quality				41,28,81,86,56,21,45	
0229-00921	00-0003	96/04/26	Douglas Reaber Daniel B Stephens & Assoc, Inc	Craig Cooper Environmental Protection Agency - Region 9	Ltr: Summary of limited investigation re PCB distribution in off-site areas w/attchs				41,28,01,83,04,21,	
0229-00920	00-0004	96/05/23	Jose Ibarra City of Tucson, AZ - City Council Member	James Garcia City of Tucson Airport Authority	Ltr: Transmits investigation results evaluating PCBs in off-site areas & requests that name be put on mailing lists re same w/attchs				41,28,01,83,04,31,21	
0229-91168	00-0005	96/05/26	Keith Bagwell Arizona Daily Star		Newsclip: Plagued family finds PCBs contaminate their yard				06,41,28,56,83,21,04	
0229-00919	00-0006	96/05/30	Karen van Rijn City of Tucson, AZ - Office of Environmental Management	Michael Brown City of Tucson, AZ - City Manager	Memo: Distribution of PCBs in off-site areas w/attchs				41,28,21,83,56,86,04	

Tucson Intl Airport Area

Tucson, Arizona

*** Draft Administrative Record Index ***

DOC #	AR #	DATE yy/mm/dd	AUTHOR	ADDRESSEE	SUBJECT	FOIA	CBI	DISC	TYPES/ACTIVITIES DESCRIPTORS	CONTRACT INFO
0229-91167	00-0007	96/06/10	Craig Cooper Environmental Protection Agency - Region 9		EPA outline on PCBs in El Vado Road area for meeting w/Tucson mayor & city council w/attchs				41,28,67,04,21,86,56	
0229-91166	00-0008	96/06/17	Richard Young City of Tucson, AZ	Craig Cooper Environmental Protection Agency - Region 9	Ltr: Requests that specified conditions be met in cleanup of Alcoverde property				41,21,28,83,01, ,	
0229-00918	00-0009	96/07/02	Douglas Reaber Daniel B Stephens & Assoc, Inc	Craig Cooper Environmental Protection Agency - Region 9	Ltr: Summary of limited investigation of PCB distribution in off-site areas w/attchs				41,28,86,83,04,81,21	
0229-91165	00-0010	96/07/02	James Garcia Tucson Airport Authority	Richard Young City of Tucson, AZ	Ltr: Issues raised by Alcoverde property owners will be addressed				41,28,67,83,66,21,86	
0229-91164	00-0011	96/07/11	Victor Schwanbeck Schwanbeck & Present	Craig Cooper Environmental Protection Agency - Region 9	Ltr: Specific questions raised by limited investigation of Alcoverde property w/map				41,21,28,83,56,04,01	
0229-91162	00-0012	96/07/30	Jose Ibarra City of Tucson, AZ - City Council Member	Craig Cooper Environmental Protection Agency - Region 9	Ltr: Specific questions raised re PCB contamination				41,28,21,83,66,01,	
0229-91163	00-0013	96/07/30	Jose Ibarra City of Tucson, AZ - City Council Member	Craig Cooper Environmental Protection Agency - Region 9	Ltr: Question raised re agreement w/property owners affected by PCB contamination				41,28,21,67,66,01,	
0229-00917	00-0014	96/07/31	AZ Dept of Health Services	Environmental Protection Agency - Region 9	Draft baseline human health risk assessment for site				41,28,56,81,86,83,21	

Tucson Intl Airport Area

Tucson, Arizona

*** Draft Administrative Record Index ***

DOC #	AR #	DATE yy/mm/dd	AUTHOR	ADDRESSEE	SUBJECT	FOIA	CBI	DISC	TYPES/ACTIVITIES DESCRIPTORS	CONTRACT INFO
0229-91161	00-0015	96/08/05	Fred Brinker Tucson Airport Authority	Craig Cooper Environmental Protection Agency - Region 9	TL: Alcoverde demand ltr of 7/23/96 re cleanup of 401 East El Vado				41,28,45,66,21,07,	
0229-91160	00-0016	96/08/15	Craig Cooper Environmental Protection Agency - Region 9	Yoshiro Tokiwa Environmental Protection Agency - Region 9	Memo: Request for concurrence re Toxic Substances Control Act (TSCA) compliance				41,28,81,21,86,04,83	
0229-91158	00-0017	96/08/26	Richard Young City of Tucson, AZ		Ltr: Specifies items to be addressed re property owners, temporary living quarters for themselves & horses & replacements needed on property				28,21,41,56,01, ,	
0229-91159	00-0018	96/08/26	Jo Ann Semones Environmental Protection Agency - Region 9	Craig Cooper Environmental Protection Agency - Region 9	Memo: Concurrence that proposed EPA remediation complies w/PCB regulations				41,81,21,28,86,03,	
0229-00916	00-0019	96/09/10	Craig Cooper Environmental Protection Agency - Region 9	Keith Takata Environmental Protection Agency - Region 9	Memo: Action memo/enforcement- lead removal request & approval w/attchs				28,42,83,04,56,41,21	
0229-91309	00-0020	96/09/18	Environmental Protection Agency - Region 9		Compendium of selected CERCLA guidance documents				41,28,81,43, , ,	